

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**Shelby Brown, individually and on behalf
of others similarly situated,**

Plaintiffs,

vs.

**PRODUCTION TESTING SERVICES,
INC. and ROBERT HOFF,**

Defendants.

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CIVIL ACTION NO. 16-CV-01152

DECLARATION OF STEVEN PARKER

STATE OF TEXAS

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COUNTY OF FORT BEND

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1. My name is **Steven Parker** I am over twenty-one years of age and am of sound mind and otherwise capable of making this Declaration. I am the director for Production Testing Services (“PTS”). I make this Declaration in support of PTS’s Motion to Disqualify. This Declaration is based on my personal knowledge and upon my knowledge of the ordinary course of business by **PTS** and its employees, and, if called as a witness, I could competently testify to the facts set forth below.

2. My duties and responsibilities as director include overseeing the business development and sales department and I also reside on the executive management team. I make the following statements based on the personal knowledge I developed in my role at PTS.

3. Field operators perform work including performing well testing, i.e. frac-flow back, measurements, lab work and maintenance, complete charts and general maintenance, clean

up and painting to keep equipment and site in its most presentable condition. Field operators are not salaried-based employees and have no true supervisory responsibilities.

4. Supervisors have true management responsibilities. Supervisors are ultimately responsible for the project and everyone at the project site. While some supervisors may assist field operators in their day-to-day duties, supervisor's ultimate responsibilities are to oversee the project, fill out appropriate paperwork, and manage the field operators at the work site. These are duties and responsibilities exclusively reserved for supervisors. Additionally, supervisors can participate in interviewing potential employees and have input on hiring and firing employees. Unlike field operators, supervisors are paid a salary plus an additional day rate for the time they are in the field.

5. From time to time, a supervisor may appoint a "lead operator" or "night supervisor." These employees are not true supervisors, but instead field operators who are temporarily put in charge. Lead operators or night supervisors, however, still report to the supervisor who remains ultimately responsible for the project.

FURTHER AFFIANT SAYETH NOT.

I hereby declare under penalty of perjury under the laws of the United States of America and the State of Texas that the foregoing is true and correct.

September 30, 2016

A handwritten signature in dark ink, appearing to read 'Steven Parker', is written over a horizontal line.

Steven Parker